



1385 Eusebio Matoso Avenue
ZIP CODE 05423-180
São Paulo - Brazil

Ney Ferraz Dias and Lauriberto Tadeu Tavares, declare under penalty of perjury as follows:

1. We are senior officers of Unibanco AIG Seguros S.A. ("Unibanco AIG"). We are making this declaration in support of the motion of Unibanco AIG to dismiss the present case.
2. Unibanco AIG is an insurance company located in and licensed to operate business in Brazil. Unibanco AIG is a joint venture owned by Unibanco S/A (50.0056%) and American International Group (49.9021%).
3. Unibanco AIG is not licensed to operate outside the Brazilian market.
4. Unibanco AIG does not advertise in the United States. It has no offices in the United States, nor does it have officers domiciled or located in the United States.




5. Usiminas Mecanica S.A. is a Brazilian company with a cargo policy issued by Unibanco AIG. On or about January 16, 2006, Unibanco AIG insured a cargo of bridge components that were being transported aboard the MALTE B. On arrival of the vessel the cargo was observed to be damaged.


6. On or about July of 2006, Unibanco AIG paid Usiminas the value of the damaged product and became subrogated to its rights. On or about March 3, 2007, Unibanco AIG, through its attorney, Mr. Christian Smera, commenced suit in civil court in Sao Paulo against BBC Chartering & Logistics GmbH for the damages sustained by the cargo.

I declare under penalty of perjury under the laws of the United States of America pursuant to 28 U.S.C. §1746 that the foregoing is true and correct.

Executed on May 5th, 2008.

Signed:


Ney Ferraz Dias


Lauriberto Tadeu Tavares

At: São Paulo, Brazil

